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From: Birchfield, Norman
Sent: Wed 12/16/2015 3:27:15 PM
Subject: RE: sharing what might be a final glyphosate draft summary of comments for Tom to send to OPP
Glyphosate Summary of ORD comments 12 14 15 LF v2 NB.docx

I think this looks good and constructive. I have a few suggestions in the attached if they are still being accepted but nothing major. Thanks!

From: Flowers, Lynn
Sent: Wednesday, December 16, 2015 9:39 AM
To: Lobdell, Danelle <Lobdell.Danelle@epa.gov>; Wood, Charles <Wood.Charles@epa.gov>; Birchfield, Norman <Birchfield.Norman@epa.gov>; Cogliano, Vincent <cogliano.vincent@epa.gov>
Subject: sharing what might be a final glyphosate draft summary of comments for Tom to send to OPP

Looping you all back in....there has been some wordsmithing from IOAA folks (nothing major, just improved clarity), and recommendations have been smoothed out. I am sharing this version as I think it might be stable. The "Bottom line recommendations" are cut and pasted here. If anyone has heartburn, please let me know.

ORD Recommendation: To strengthen OPP's human health assessment and address the differences in the potential cancer findings, we recommend the following:

- Expand the discussion of the cancer data and subsequent findings to include a detailed and thorough discussion of the issues that caused OPP to come to a different conclusion than IARC, if not directly noting the IARC findings themselves. Key controversies in how one could evaluate the data should be highlighted to provide transparency in how the Agency is making its determination. OPP could include a discussion of the strengths and weaknesses of choosing one cancer descriptor over the other.
- We understand that OPP plans to take the assessment to the SAP for external peer review. We recommend developing charge questions that will be specific to the cancer findings and ask the panel to address the specific scientific differences that exist between the IARC and OPP cancer determinations. ORD is willing to work with OPP to draft the charge questions, or review them before they are finalized.

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